IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRTUAL CREATIVE ARTISTS, LLC,	
Plaintiff,	C.A. No. 1:24-CV-5346
v.	JURY TRIAL DEMANDED
BUZZFEED, INC.,	PATENT CASE
Defendant.	

DEFENDANT BUZZFEED'S NOTICE OF MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

Defendant Buzzfeed, Inc. respectfully submits this Motion to Dismiss Plaintiff Virtual Creative Artists, LLC's Complaint For Failure to State a Claim pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds for this Motion are set forth in Defendant Buzzfeed, Inc.'s Memorandum of Law in Support, filed contemporaneously herewith.

Dated: September 16, 2024

/s/ Excylyn J. Hardin-Smith

Excylyn J. Hardin-Smith (EHS7780) hardin-smith@fr.com 7 Times Square, 20th Floor New York, New York 10036 Telephone: (212) 765-5070 Facsimile: (212) 258-2291

Neil J. McNabnay Texas Bar No. 24002583 Lance E. Wyatt Texas Bar No. 24093397 Michael R. Ellis Texas Bar No. 24102726 Nan Lan Texas Bar No. 24121711

1717 Main Street, Suite 5000 Dallas, Texas 75201 (214) 747-5070 (Telephone) (214) 747-2091 (Facsimile) mcnabnay@fr.com wyatt@fr.com ellis@fr.com lan@fr.com

COUNSEL FOR DEFENDANT BUZZFEED, INC.,